

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CAROLYN GREENE, on behalf of herself )  
and all others similarly situated, )  
  )  
  Plaintiff, )  
  )  
                                       v. ) Civil Action No. 1:03-CV-12628 (NG)  
  )

BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )  
  )  
  Defendants. )

JOHN G. ESPOSITO, JR., on behalf of )  
himself and all others similarly situated, )  
  )  
  Plaintiff, )  
  )  
                                       v. ) Civil Action No. 1:04-CV-10013 (NG)  
  )

BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )  
  )  
  Defendants. )

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**MOTION TO CONSOLIDATE ACTIONS,  
TO BE APPOINTED LEAD PLAINTIFFS AND FOR APPROVAL OF LEAD  
PLAINTIFFS' SELECTION OF LEAD COUNSEL AND LIAISON COUNSEL**

JOSEPH L. KING, on behalf of himself )  
and all others similarly situated, )  
  )  
  )  
  Plaintiff, )  
  )  
  )  
  v. ) Civil Action No. 1:04-CV-10038 (NG)  
  )  
  )  
BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )  
  )  
  )  
  Defendants. )

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MICHAEL E. CRIDEN, individually and )  
on behalf of all others similarly situated, )  
  )  
  )  
  Plaintiff, )  
  )  
  )  
  v. ) Civil Action No. 1:04-CV-10046 (NG)  
  )  
  )  
BIOPURE CORPORATION, THOMAS )  
A. MOORE, and CARL W. RAUSCH, )  
  )  
  )  
  Defendants. )

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ISRAEL SHURKIN and SHARON )  
SHURKIN, individually and on behalf of )  
all others similarly situated, )  
  )  
  )  
  Plaintiff, )  
  )  
  )  
  v. ) Civil Action No. 1:04-CV-10055 (NG)  
  )  
  )  
BIOPURE CORPORATION, THOMAS )  
A. MOORE, and CARL W. RAUSCH, )  
  )  
  )  
  Defendants. )

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JAMES J. NIZZO, VIRGINIA C. NIZZO, )  
and CARLO CILIBERTI, on behalf of )  
themselves and all others similarly situated, )  
  )  
  Plaintiff, )  
  )  
v.  ) Civil Action No. 1:04-CV-10065 (NG)  
  )  
BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )  
  )  
  Defendants. )

---

BARRY BROOKS, on behalf of himself )  
and all others similarly situated, )  
  )  
  Plaintiff, )  
  )  
v.  ) Civil Action No. 1:04-CV-10077 (NG)  
  )  
BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )  
  )  
  Defendants. )

---

ANASTASIOS PERLEGIS, individually )  
and on behalf of all others similarly )  
situated, )  
  )  
  Plaintiff, )  
  )  
v.  ) Civil Action No. 1:04-CV-10078 (NG)  
  )  
BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )  
  )  
  Defendants. )

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|  |   |                                     |
|--|---|-------------------------------------|
| MARTIN WEBER, on behalf of himself<br>and all others similarly situated,                   | ) |                                     |
|  | ) |                                     |
| Plaintiff,   | ) |                                     |
|  | ) |                                     |
| v.   | ) | Civil Action No. 1:04-CV-10090 (NG) |
|  | ) |                                     |
| BIOPURE CORPORATION, THOMAS<br>A. MOORE, CARL W. RAUSCH, and<br>RONALD F. RICHARDS,        | ) |                                     |
|  | ) |                                     |
| Defendants.  | ) |                                     |
| <hr/>  |   |                                     |
| BRUCE HATMS, individually and on<br>behalf of all others similarly situated,               | ) |                                     |
|  | ) |                                     |
| Plaintiff,   | ) |                                     |
|  | ) |                                     |
| v.   | ) | Civil Action No. 1:04-CV-10144 (NG) |
|  | ) |                                     |
| BIOPURE CORPORATION, THOMAS<br>A. MOORE, CARL W. RAUSCH, and<br>RONALD F. RICHARDS,        | ) |                                     |
|  | ) |                                     |
| Defendants.  | ) |                                     |
| <hr/>  |   |                                     |
| MODEL PARTNERS LIMITED,<br>individually and on behalf of all others<br>similarly situated, | ) |                                     |
|  | ) |                                     |
| Plaintiff,   | ) |                                     |
|  | ) |                                     |
| v.   | ) | Civil Action No. 1:04-CV-10155 (NG) |
|  | ) |                                     |
| BIOPURE CORPORATION, THOMAS<br>A. MOORE, CARL W. RAUSCH, and<br>RONALD F. RICHARDS,        | ) |                                     |
|  | ) |                                     |
| Defendants.  | ) |                                     |

[Captions continued on next page]

JUNE E. PATENAUME, individually and )  
on behalf of all others similarly situated, )  
  )  
  )  
  Plaintiff, )  
  )  
  )  
  v. ) Civil Action No. 1:04-CV-10179 (NG)  
  )  
BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )  
  )  
  Defendants. )

---

NANCY L. PINKNEY and GERTRUDE )  
PINKNEY, individually and on behalf of )  
all others similarly situated, )  
  )  
  )  
  Plaintiff, )  
  )  
  )  
  v. ) Civil Action No. 1:04-CV-10189 (NG)  
  )  
BIOPURE CORPORATION, THOMAS )  
A. MOORE, and CARL W. RAUSCH, )  
  )  
  )  
  Defendants. )

---

W. KENNETH JOHNSON, on behalf of )  
himself and all others similarly situated, )  
  )  
  )  
  Plaintiff, )  
  )  
  )  
  v. ) Civil Action No. 1:04-CV-10190 (NG)  
  )  
BIOPURE CORPORATION, THOMAS )  
A. MOORE, CARL W. RAUSCH, and )  
RONALD F. RICHARDS, )  
  )  
  )  
  Defendants. )

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PLEASE TAKE NOTICE that class members Neil & Susan Fincman, Michael Navilio, Robert Powell and Edward P. Collins (collectively, the "Biopure Lead Plaintiff Group"), by their counsel, hereby move this Court, for an Order: (i) appointing the Biopure Lead Plaintiff Group as lead plaintiffs; (ii) approving the Biopure Lead Plaintiff Group's selection of the law firms of Schiffren & Barroway, LLP and Cauley Geller Bowman & Rudman, LLP to serve as lead counsel; (iii) approving the Biopure Lead Plaintiff Group's selection of the law firm of Gilman and Pastor, LLP to serve as liaison counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this motion, the Biopure Lead Plaintiff Group submits herewith a memorandum of law and declaration of David Pastor.

Dated: March 1, 2004.

Respectfully submitted,

**GILMAN AND PASTOR, LLP**

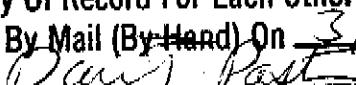
By:



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I Hereby Certify That A True Copy of  
The Above Document Was Served Upon  
The Attorney Of Record For Each Other  
Party By Mail (By Hand) On 3/1/04  


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